

**NEW SOURCE CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT**

**Fort Wayne Liquid Coatings, Inc.
2401 Meyer Road
Fort Wayne, Indiana 46803**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 003-11094-00302	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary metal and fiberglass reinforced plastic parts surface coating source.

Authorized Individual: Gregg David
Source Address: 2401 Meyer Road, Fort Wayne, Indiana 46803
Mailing Address: 2401 Meyer Road, Fort Wayne, Indiana 46803
Phone Number: (219) 426-7169
SIC Code: 3479 and 9999
County Location: Allen
County Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD or Emission Offset Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) One (1) paint booth, known as Paint Booth 1, equipped with two (2) high volume, low pressure (HVLV) spray guns and dry filters as overspray control, exhausting to stacks S1 and S2, capacity: 27 plastic or metal automotive parts per hour.
- (b) One (1) paint booth, known as Paint Booth 2, equipped with two (2) high volume, low pressure (HVLV) spray guns and dry filters as overspray control, exhausting to stacks S3 and S4, capacity: 27 plastic or metal automotive parts per hour.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour:
 - (1) Four (4) units at 1.5 million British thermal units per hour;
 - (2) Two (2) units at 2.2 million British thermal units per hour; and
 - (3) One (1) unit at 1.0 million British thermal units per hour.
- (d) An operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).
- (e) Pursuant to 326 IAC 2-7-4(a)(1)(A)(ii) and 326 IAC 2-5.1-4, the Permittee shall apply for a Title V operating permit within twelve (12) months of the date on which the source first meets an applicability criterion of 326 IAC 2-7-2.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of VOC is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Source Modification [326 IAC 2-7-10.5]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-10.5 whenever the Permittee seeks to construct new emissions units, modify existing emissions units, or otherwise modify the source.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAM, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.9 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

Testing Requirements

C.10 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Maintenance of Monitoring Equipment [IC 13-14-1-13]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.16 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.17 Annual Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.18 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;

- (5) The results of such analyses; and
- (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.20 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) A malfunction as described in 326 IAC 1-6-2; or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds five percent (5%) of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.21 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Management stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Management
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description - Two (2) paint booths and solvent usage

- (a) One (1) paint booth, known as Paint Booth 1, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stacks S1 and S2, capacity: 27 plastic or metal automotive parts per hour.
- (b) One (1) paint booth, known as Paint Booth 2, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stacks S3 and S4, capacity: 27 plastic or metal automotive parts per hour.
- (d) An operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to the metal parts shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicators for any calendar day, for forced warm air dried coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New facilities; General reduction requirements) the Best Available Control Technology (BACT) shall be used for the two (2) paint booths (Paint Booth 1 and Paint Booth 2) at all times except when coating metal parts. The source shall comply with the requirements in Condition D.1.1 when coating metal parts. BACT for these facilities has been determined to be the following:

- (a) The VOC content of coating delivered to the applicators at the paint booths and applied to plastic parts only shall be as follows:

<u>Coating</u>	<u>VOC content (pounds VOC per gallon of coating, less water (lbs/gal)), not to exceed</u>
Primer	5.10
Colorcoat	3.89
Basecoat	5.49
Clearcoat	4.21

- (b) All coatings will be applied using high volume, low pressure (HVLP) spray equipment.

- (c) The total VOC usage in coatings used for plastic parts and cleanup solvents used for metal and plastic parts shall be limited to less than 136 tons per consecutive twelve (12) month period.
- (d) The listed work practices as follows:
 - (1) Cleaning of all parts, metal or plastic, with a cleaning solvent prior to the application of the first coating shall be by hand-wipe. The cleaning solvent shall contain no less than twenty percent (20%) by weight of a non-VOC, non-HAP compound.
 - (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
 - (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
 - (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
 - (5) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized.

D.1.3 Hazardous Air Pollutants (HAPs)

The usage of each individual HAP shall be limited to less than 10 tons per consecutive twelve (12) month period. The total HAP usage shall be limited to less than 25 tons per consecutive twelve (12) month period. Compliance with this limitation will make the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the PM from the two (2) paint booths (Paint Booth 1 and Paint Booth 2) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 2-2]

Any change or modification which may increase the total VOC emissions of these facilities to 250 tons per year or more may cause the source to be subject to the requirements of 326 IAC 2-2, Prevention of Significant Deterioration, and shall require prior approval.

D.1.6 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emissions unit and any control devices.

Compliance Determination Requirements

D.1.7 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC content and VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 VOC Emissions

Compliance with Conditions D.1.2 and D.1.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and hazardous air pollutant usage for the most recent twelve (12) month period.

D.1.10 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the two (2) paint booths (Paint Booth 1 and Paint Booth 2) are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1, S2, S3 and S4) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.12 Record Keeping Requirements

-
- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken daily and monthly, as stated below, and shall be complete and sufficient to establish compliance with the VOC content and VOC and HAP usage limits established in Conditions D.1.1, D.1.2 and D.1.3.
- (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and HAP usage for each month;
 - (6) The weight of VOCs and HAPs emitted for each compliance period; and
 - (7) Contemporaneously with making a change between complying with Condition D.1.1 and Condition D.1.2, a record in a log of the condition under which these facilities are operating
- (b) To document compliance with Conditions D.1.10 and D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2(c) and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description - Natural gas-fired combustion sources

(c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour:

- (1) Four (4) units at 1.5 million British thermal units per hour;
- (2) Two (2) units at 2.2 million British thermal units per hour; and
- (3) One (1) unit at 1.0 million British thermal units per hour.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

There are no emission limitations for these facilities.

Indiana Department of Environmental Management
Office of Air Management
Compliance Data Section
Quarterly Report

Company Name: Fort Wayne Liquid Coatings, Inc.
Location: 2401 Meyer Road, Fort Wayne, Indiana 46803
Permit No.: MSOP 003-11094-00302
Source/Facility: Two (2) paint booths (Paint Booth 1 and Paint Booth 2)
Parameter: Volatile Organic Compounds (VOC) usage in coatings used for plastic parts and cleanup solvents used for metal and plastic parts
Limitation: Less than 136 tons per consecutive twelve (12) month period, total

Year: _____

Month	VOC usage	VOC usage	VOC usage
	This Month	Previous 11 Months	12 Month Total

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Fort Wayne Liquid Coatings, Inc.
Fort Wayne, Indiana
Permit Reviewer:MES

Page 23 of 25
MSOP 003-11094-00302

Indiana Department of Environmental Management
Office of Air Management
Compliance Data Section
Quarterly Report

Company Name: Fort Wayne Liquid Coatings, Inc.
Location: 2401 Meyer Road, Fort Wayne, Indiana 46803
Permit No.: MSOP 003-11094-00302
Source/Facility: Two (2) paint booths (Paint Booth 1 and Paint Booth 2)
Parameter: Each individual Hazardous Air Pollutant (HAP) usage, including cleanup solvents
Limitation: Less than 10 tons per consecutive twelve (12) month period

Year: _____

Month	Individual HAP usage	Individual HAP usage	Individual HAP usage
	This Month	Previous 11 Months	12 Month Total

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Indiana Department of Environmental Management
Office of Air Management
Compliance Data Section
Quarterly Report

Company Name: Fort Wayne Liquid Coatings, Inc.
Location: 2401 Meyer Road, Fort Wayne, Indiana 46803
Permit No.: MSOP 003-11094-00302
Source/Facility: Two (2) paint booths (Paint Booth 1 and Paint Booth 2)
Parameter: Total Hazardous Air Pollutant (HAP) usage, including cleanup solvents
Limitation: Less than 25 tons per consecutive twelve (12) month period

Year: _____

Month	Total HAP usage	Total HAP usage	Total HAP usage
	This Month	Previous 11 Months	12 Month Total

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under
326 IAC 2-6.1-5(a)(5).

Company Name:	Fort Wayne Liquid Coatings, Inc.
Address:	2401 Meyer Road
City:	Fort Wayne
Phone #:	(219) 426-7169
MSOP #:	003-11094-00302

I hereby certify that Fort Wayne Liquid Coatings, Inc. is

☒ still in operation.

☐ no longer in operation.

I hereby certify that Fort Wayne Liquid Coatings, Inc. is

☒ in compliance with the requirements of
MSOP 003-11094-00302.

☐ not in compliance with the requirements
of MSOP 003-11094-00302.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit

Source Background and Description

Source Name: Fort Wayne Liquid Coatings, Inc.
Source Location: 2401 Meyer Road, Fort Wayne, Indiana 46803
County: Allen
SIC Code: 3479 and 9999
Operation Permit No.: MSOP 003-11094-00302
Permit Reviewer: CarrieAnn Ortolani

The Office of Air Management (OAM) has reviewed an application from Fort Wayne Liquid Coatings, Inc. relating to the construction and operation of a metal and fiberglass reinforced plastic parts surface coating source.

Permitted Emission Units and Pollution Control Equipment

The source consists of no permitted emission units and pollution control devices.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of no unpermitted emission units and pollution control devices.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following equipment:

- (a) One (1) paint booth, known as Paint Booth 1, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stacks S1 and S2, capacity: 27 plastic or metal automotive parts per hour.
- (b) One (1) paint booth, known as Paint Booth 2, equipped with two (2) high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stacks S3 and S4, capacity: 27 plastic or metal automotive parts per hour.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour:

- (1) Four (4) units at 1.5 million British thermal units per hour;
 - (2) Two (2) units at 2.2 million British thermal units per hour; and
 - (3) One (1) unit at 1.0 million British thermal units per hour.
- (d) An operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs.

Existing Approvals

The source has no previous approvals.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
S1	Paint Booth 1	38.0	2.0	12,500	70
S2	Paint Booth 1	38.0	2.0	12,500	70
S3	Paint Booth 2	38.0	2.0	12,500	70
S4	Paint Booth 2	38.0	2.0	12,500	70
S5	Oven	38.0	1.2	3,300	180

Enforcement Issue

Although the paint booths have been constructed, the emission units have not been installed. Therefore, the facilities are not considered constructed prior to receipt of the proper permit. There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 25, 1999, with additional information received on August 11, August 30, September 3, September 22, and September 27, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 4 of 4).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	53.9
PM ₁₀	54.2
SO ₂	0.030
VOC	166
CO	4.19
NO _x	4.99

HAPs	Potential To Emit (tons/year)
Xylene	29.0
Toluene	14.9
MEK	21.6
MIBK	17.9
Ethyl benzene	7.28
Glycol Ethers	4.68
HDI	0.050
Benzene	1.049E-04
Dichlorobenzene	5.992E-05
Formaldehyde	3.745E-03
Hexane	8.988E-02
Toluene	1.698E-04
Lead	2.497E-05
Cadmium	5.493E-05
Chromium	6.990E-05
Manganese	1.897E-05
Nickel	1.049E-04
TOTAL	76.3

- (a) The potentials to emit (as defined in the Indiana Rule) of VOC, PM and PM₁₀ are equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5 and 326 IAC 2-6.
- (b) The potential to emit (as defined in the Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in the Indiana Rule) of a combination HAPS is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5 and 326 IAC 2-6.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPS
Two (2) paint booths	2.65	2.65	0.0	136	0.0	0.0	24.9
Combustion	0.095	0.379	0.030	0.275	4.19	4.99	0.094
Total Emissions	2.74	3.03	0.030	136	4.19	4.99	< 25

- (a) The HAP emissions have been limited to less than 10 tons per year of each individual HAP and less than 25 tons per year of any combination of HAPs to make the requirements of 326 IAC 2-4-1.1 not applicable.
- (b) The VOC emissions from the two (2) paint booths will be limited to less than 136 tons per year pursuant to 326 IAC 8-1-6 (New facilities: General reduction requirements).

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Allen County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	2.74
PM_{10}	3.03
SO_2	0.030
VOC	136
CO	4.19
NO_x	4.99
Single HAP	< 10
Combination HAPS	< 25

This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply. The potential emissions of each criteria pollutant is less than 250 tons per year. Therefore, no limitation is required to make the source a minor source pursuant to 326 IAC 2-2 and 40 CFR 52.21.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) at least one of the criteria pollutant is greater than or equal to 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is greater than or equal to 10 tons per year, or
- (c) any combination of HAPS is greater than or equal to 25 tons/year.

This new source shall apply for a Part 70 (Title V) operating permit within twelve (12) months after this source becomes subject to Title V.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 326 IAC 20; 40 CFR Part 63 and 40 CFR Part 61) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

The requirements of 326 IAC 2-4.1-1 can be applicable to the two (2) paint booths operating in series because the source commenced construction after July 27, 1997 and the potential to emit any individual hazardous air pollutant (HAP) is greater than 10 tons per year and the potential to emit any combination of HAPs is greater than 25 tons per year. The source has agreed to limit emissions of each individual HAP to less than 10 tons per consecutive twelve (12) month period and total HAPs to less than 25 tons per consecutive twelve (12) month period. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The requirements of 326 IAC 6-2-4 are not applicable, because there are no indirect heating units at this source.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the two (2) paint booths and the oven shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the two (2) paint booths are in operation, in order to comply with this limit.

326 IAC 8-1-6 (New Facilities; General reduction requirements)

Since the two (2) paint booths operating in series have a potential to emit VOC greater than 25 tons per year, will commence operation after January 1, 1980 and there are no 326 IAC 8 rules for coating fiberglass reinforced plastic parts or for cleaning solvents used on metal and plastic parts, the requirements of 326 IAC 8-1-6 are applicable. The source will be required to use the Best Available Control Technology (BACT). The source conducted a BACT analysis. The study evaluated the feasibility of waterborne coatings, nonphotochemically reactive solvent substitutes, high solids paints, high transfer efficiency of spray equipment, carbon adsorption, incineration, chemical scrubbers, condensation, and biofiltration. The following options were considered technologically not feasible:

Waterborne coatings - Fort Wayne Liquid Coatings is a contract coating facility and is restricted in its selection of coatings by its customer requirements. Fort Wayne liquid coatings will utilize water-

borne coatings when they are approved by its customers.

Nonphotochemically reactive solvents - Many nonphotochemically reactive hydrocarbons are associated with stratospheric ozone depletion or are hazardous air pollutants. Acetone may be used as a VOC/HAP replacement after further studies. Acetone will be used as a cleanup solvent.

Chemical Scrubber - A scrubber is technically not feasible because each process emits several different chemicals and different solvents would be needed for each target chemical.

Condensation - Since the concentrations in the paint line exhaust are relatively low, a condensation system is not an efficient method of control.

Biofiltration - Biofiltration is a relatively new method of control in the United States and is primarily used for odor control. Since there are no known applications of biofiltration for the removal of VOC or HAPs from painting miscellaneous fiberglass reinforced plastic and metal parts, biofiltration will not be considered a feasible control option.

The following methods of add-on control were considered in a cost analysis:

Catalytic Incineration - Since the fuel requirement for a catalytic incinerator without a concentrator is approximately 10 times higher than with a concentrator, only catalytic incineration with a concentrator was considered in the cost analysis of this device.

Concentrator Treatment Systems - Carbon and zeolite concentrator treatment systems are technically feasible. Zeolite concentrator treatment systems have a lower cost than carbon treatment systems and zeolite can withstand higher temperatures. Therefore, a cost analysis was performed for a zeolite concentrator with an oxidizer.

Carbon Adsorption - This method of control is technologically feasible and a cost analysis was performed.

Regenerative Thermal Oxidizer Systems - Regenerative thermal oxidizer systems are technically feasible and a cost analysis was performed.

The cost of add-on control methods, as determined by the cost analysis, ranged between \$1,993 per ton of VOC removed and \$4,030 per ton of VOC removed. The least expensive was adding a Zeolite Concentrator with an oxidizer (\$1,993 per ton). The annual cost of the Zeolite Concentrator with an oxidizer is \$318,906. The projected profit of this source increases from \$10,000 in 2000 to \$80,000 in 2003. Therefore, the total annual cost of adding a Zeolite Concentrator with an oxidizer is 3,189% of the projected profit in 2000 and 399% of the projected profit in 2003. Therefore, these add-on control methods are economically not feasible for this source.

Additional control methods considered by the source are as follows:

Transfer Efficiency - High volume, low pressure (HVLP) spray equipment will be used to apply coatings at these facilities. The exterior of the units will be hand-wiped with a cleaning solvent prior to surface coating.

High solids coating systems - All coatings used on metal parts will comply with the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating). This rule requires that the volatile organic compound (VOC) content of coating delivered to the applicator at the paint booths when coating metal parts be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

South Coast Air Quality Management District (SCAQMD) Rule 1145 for plastic coating - Upon the request of IDEM, OAM, the source considered compliance with Rule 1145 as a possible BACT. Rule 1145 requires that the volatile organic compound (VOC) content of coating (excluding clearcoat) delivered to the applicators at the paint booths when coating plastic parts be limited to 3.5 pounds of VOCs per gallon of coating less water. The cost of complying with this rule would be \$10,545 per ton or \$544,602 per year. Therefore, Rule 1145 is economically not feasible for this source. The source has agreed to VOC content limitations described below.

As a result of the BACT analysis, it is determined that BACT for this source at all times, except when coating metal parts, is the following:

- (a) The VOC content of coating delivered to the applicators at the paint booths and applied to plastic parts only shall be as follows:

<u>Coating</u>	<u>VOC content (pounds VOC per gallon of coating, less water (lbs/gal)), not to exceed</u>
Primer	5.10
Colorcoat	3.89
Basecoat	5.49
Clearcoat	4.21

- (b) All coatings will be applied using high volume, low pressure (HVLV) spray equipment.
- (c) The total VOC usage in coatings used for plastic parts and cleanup solvents used for metal and plastic parts shall be limited to less than 136 tons per consecutive twelve (12) month period.
- (d) The listed work practices as follows:
- (1) Cleaning of all parts, metal or plastic, with a cleaning solvent prior to the application of the first coating shall be by hand-wipe. The cleaning solvent shall contain no less than twenty percent (20%) by weight of a non-VOC, non-HAP compound.
 - (2) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
 - (3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
 - (4) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
 - (5) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the paint booths when coating metal parts shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into

containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the paint booths are in compliance with this requirement when coating metal sheets. Since the panels coated can be fiberglass reinforced plastics or metal, the worst case coating does not show compliance with this rule. Record keeping will be required for this source when coating metal parts to show compliance with this rule.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations (pages 2 and 4 of 4).

Conclusion

The construction and operation of this miscellaneous metal and plastic parts surface coating source shall be subject to the conditions of the attached proposed New Source Construction and Minor Source Operating Permit 003-11094-00302.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Fort Wayne Liquid Coatings
Address Ci 2401 Meyer Road, Fort Wayne, Indiana 46803
MSOP: 003-11094
Pit ID: 003-00302
Reviewer: CarrieAnn Ortolani
Date: June 25, 1999

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gallon solids	Transfer Efficiency
SMC / FRP PANELS																
Booth 1 (S1, S2)																
BLACK PRIMER E67BC17	10.39	47.50%	0.00%	47.50%	0.00%	33.70%	0.1097	27.0	4.94	4.94	14.62	350.83	64.03	17.69	14.64	75.00%
REDUCER R6K30	6.76	100.00%	0.00%	*****	0.00%	0.00%	0.0183	27.0	6.76	6.76	3.34	80.16	14.63	0.00	n/a	75.00%
B CATALYST V66B27	9.57	40.00%	0.00%	40.00%	0.00%	52.30%	0.0320	27.0	3.83	3.83	3.31	79.38	14.49	5.43	7.32	75.00%
R-T-S	9.81	50.17%	0.00%	50.17%	0.00%	33.57%	0.1600	27.0	4.92	4.92	21.27	510.37	93.14	23.12	14.67	75.00%
Booth 2 (S3, S4)																
REDUCER R6K30	6.76	100.00%	0.00%	*****	0.00%	0.00%	0.0267	27.0	6.76	6.76	4.87	116.96	21.34	0.00	n/a	75.00%
B CATALYST B66B27	9.57	40.00%	0.00%	40.00%	0.00%	52.30%	0.0333	27.0	3.83	3.83	3.44	82.60	15.07	5.65	7.32	75.00%
HS F9A DEERE GREEN F63GC32	8.36	34.50%	0.00%	34.50%	0.00%	57.80%	0.1000	27.0	2.88	2.88	7.79	186.90	34.11	16.19	4.99	75.00%
R-T-S	8.34	44.67%	0.00%	44.67%	0.00%	47.01%	0.1600	27.0	3.73	3.73	16.10	386.46	70.53	21.84	7.93	75.00%
FRP HOOD PAINTING																
Booth 1 (S1, S2)																
BASECOAT U 7 SERIES (ABS-BF)	8.08	63.99%	0.00%	63.99%	0.00%	28.10%	0.0816	27.0	5.17	5.17	11.39	273.39	49.89	7.02	18.40	75.00%
STABILIZER BCS600B	7.54	83.02%	0.00%	83.02%	0.00%	13.70%	0.0408	27.0	6.26	6.26	6.90	165.50	30.20	1.54	45.69	75.00%
CATALYST UH-80	9.08	19.82%	0.00%	19.82%	0.00%	76.00%	0.0026	27.0	1.80	1.80	0.13	3.03	0.55	0.56	2.37	75.00%
R-T-S	7.92	68.85%	0.00%	68.85%	0.00%	24.40%	0.1250	27.0	5.46	5.46	18.41	441.92	80.65	9.12	22.36	75.00%
Booth 2 (S3, S4)																
HIGH SOLIDS CLEARCOAT SYSTEM	7.92	49.87%	0.00%	49.87%	0.00%	42.40%	0.0833	27.0	3.95	3.95	8.88	213.20	38.91	9.78	9.32	75.00%
REDUCER R6K30	6.76	100.00%	0.00%	*****	0.00%	0.00%	0.0208	27.0	6.76	6.76	3.80	91.11	16.63	0.00	n/a	75.00%
CATALYST UH-80	9.08	19.82%	0.00%	19.82%	0.00%	76.00%	0.0208	27.0	1.80	1.80	1.01	24.26	4.43	4.48	2.37	75.00%
R-T-S	7.92	51.26%	0.00%	51.26%	0.00%	40.93%	0.1249	27.0	4.06	4.06	13.69	328.57	59.96	14.25	9.92	75.00%
METAL SHEET COATING																
Booth 1 (S1, S2)																
HIGH SOLIDS PRODUCTION PRIMER	12.09	24.52%	0.00%	24.52%	0.00%	56.54%	0.1410	24.0	2.96	2.96	10.03	240.76	43.94	33.81	5.24	75.00%
Booth 2 (S3, S4)																
POLYURETHANE ENAMEL TOPCOAT	8.24	22.80%	0.00%	22.80%	0.00%	44.48%	0.0907	24.0	1.88	1.88	4.09	98.15	17.91	15.16	4.22	75.00%
HARDNER AUE-301	8.72	30.05%	0.00%	30.05%	0.00%	63.05%	0.0302	24.0	2.62	2.62	1.90	45.58	8.32	4.84	4.16	75.00%
ACCELERATOR UA-11	8.16	98.04%	0.00%	98.04%	0.00%	1.57%	0.0060	24.0	8.00	8.00	1.15	27.65	5.05	0.03	509.56	75.00%
R-T-S	8.35	28.08%	0.00%	28.08%	0.00%	46.87%	0.1269	24.0	2.34	2.34	7.14	171.38	31.28	20.03	5.00	75.00%
CLEAN-UP SOLVENT MS100	6.66	100.00%	20.00%	80.00%	15.99%	0.00%	0.0035	24.0	6.34	5.33	0.44	10.65	1.94	0.00	n/a	75.00%

PM Control E 94.00%

State Potential Emissions

Add worst case coating to all solvents

Uncontrolled

37.8

907

166

53.8

Controlled

37.8

907

166

3.23

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Fort Wayne Liquid Coatings
Address: 12401 Meyer Road, Fort Wayne, Indiana 46803
MSOP: 003-11094
Pit ID: 003-00302
Reviewer: CarrieAnn Ortolani
Date: June 25, 1999

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hr)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % MIBK	Weight % Ethyl benzene	Weight % Glycol Ethers	Weight % HDI	Xylene Emission s (tons/yr)	Toluene Emissions (tons/yr)	MEK Emissions (tons/yr)	MIBK Emission s (tons/yr)	Ethyl benzene Emission s (tons/yr)	Glycol Ether Emissions (tons/yr)	Hexamethyl ene Diisocyanat e Emissions (tons/yr)	Total Emissions (tons/yr)
SMC / FRP PANELS																		
Booth 1 (S1, S2)																		
BLACK PRIMER E67BC17	10.39	0.1097	27.0	9.00%	0.00%	16.00%	0.00%	1.60%	0.00%	0.00%	12.13	0.00	21.57	0.00	2.16	0.00	0.00	35.85
REDUCER R6K30	6.76	0.0183	27.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B CATALYST V66V27	9.57	0.0320	27.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Booth 2 (S3, S4)																		
REDUCER R6K30	6.76	0.0267	27.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B CATALYST V66V27	9.57	0.0333	27.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HS F9A DEERE GREEN F63GC32	8.36	0.1000	27.0	5.60%	12.00%	0.00%	10.90%	1.00%	0.00%	0.00%	5.54	11.86	0.00	10.78	0.99	0.00	0.00	29.17
FRP HOOD PAINTING																		
Booth 1 (S1, S2)																		
BASECOAT U 7 SERIES (ABS-BF)	8.08	0.0816	27.0	25.00%	5.00%	0.00%	0.00%	7.00%	6.00%	0.00%	19.49	3.90	0.00	0.00	5.46	4.68	0.00	33.53
STABILIZER BCS600B	7.54	0.0408	27.0	26.00%	27.00%	0.00%	0.00%	5.00%	0.00%	0.00%	9.46	9.82	0.00	0.00	1.82	0.00	0.00	21.10
CATALYST UH-80	9.08	0.0026	27.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.20%	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01
Booth 2 (S3, S4)																		
HIGH SOLIDS CLEARCOAT SYSTEM	7.92	0.0833	27.0	0.00%	0.00%	17.00%	9.00%	0.00%	0.00%	0.00%	0.00	0.00	13.26	7.02	0.00	0.00	0.00	20.29
REDUCER R6K30	6.76	0.0208	27.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CATALYST UH-80	9.08	0.0208	27.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.20%	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.04
METAL SHEET COATING																		
Booth 1 (S1, S2)																		
HIGH SOLIDS PRODUCTION PRIMER	12.09	0.1410	24.0	0.00%	0.00%	1.00%	10.00%	1.00%	0.00%	0.00%	0.00	0.00	1.79	17.92	1.79	0.00	0.00	21.50
Booth 2 (S3, S4)																		
POLYURETHANE ENAMEL TOPCOAT	8.24	0.0907	24.0	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	3.93	0.00	0.00	0.00	0.00	3.93
HARDNER AUE-301	8.72	0.0302	24.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ACCELERATOR UA-11	8.16	0.0060	24.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CLEAN-UP SOLVENT MS100																		
CLEAN-UP SOLVENT MS100	6.66	0.0035	24.0	0.00%	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	1.21	0.00	0.00	0.00	0.00	0.00	1.21

Total State Potential Emissions **29.0 14.9 21.6 17.9 7.28 4.68 0.050 76.2**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Page 3 of 4 TSD App A

Company Name Fort Wayne Liquid Coatings
Address City 2401 Meyer Road, Fort Wayne, Indiana 46803
MSOP: 003-11094
Plt ID: 003-00302
Reviewer: CarrieAnn Ortolani
Date: June 25, 1999

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

11.4

99.9

	Pollutant					
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	SO2 0.6	NOx 100.0 **see below	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.095	0.379	0.030	4.99	0.275	4.19

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
above
emission

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Page 4 of 4 TSD App A

Company Name Fort Wayne Liquid Coatings
Address City 2401 Meyer Road, Fort Wayne, Indiana 46803
MSOP: 003-11094
Plt ID: 003-00302
Reviewer: CarrieAnn Ortolani
Date: June 25, 1999

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.049E-04	5.992E-05	3.745E-03	8.988E-02	1.698E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.497E-05	5.493E-05	6.990E-05	1.897E-05	1.049E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.